

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

MITSUKO MAEDA)	
)	
Petitioner)	
)	
v.)	Case No. 19-cv-02396 ELH
)	
TOMMY KWOKWING WONG)	
)	
Respondent)	
)	

ANSWER

Now comes the Respondent, Tommy Kwokwing Wong, by his attorneys, John J. Condliffe, Esq. and Levin & Gann, P.A., who Answers the Petitioner and states:

1. Respondent incorporates by reference ¶¶ 1-61 of his original Answer.
2. While not an affirmative defense as such, Respondent avers that the habitual residence of the children was the United States.
3. While not an affirmative defense as such, Respondent denies that he has wrongfully retained the children.
4. The children are well settled and/or acclimated in the United States.
5. Return of the minor children to Japan would expose the children to grave risk of psychological harm.
6. Return of the minor children to Japan would expose the children to an intolerable situation.

7. Return of the children would violate the fundamental principles of the United States of America relating to the protection of human rights and fundamental freedoms.

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